

EXHIBIT 11

Lodestar/Multiplier and Fee Percentages in PSLRA Settlements \$400 million and Above

The cases highlighted in blue are discussed in the Miller declaration ¶ 58 (\$550 - \$800 million) and in the Coffee declaration ¶ 17 (\$490 - \$690 million)

No.	Order	Total Settlement Amount	Fee Awarded	Fee Percentage Awarded (as percentage of the Gross Settlement Amount)	Lodestar Multiplier	Passed motion to dismiss stage prior to settlement?
1	<i>In re Enron Corp. Sec., Deriv. & ERISA Litig.</i> , 586 F. Supp. 2d 732 (S.D. Tex. 2008)	\$ 7,227,390,000	\$ 688,239,000	9.52%	5.22	✓
2	<i>In re WorldCom, Inc. Sec. Litig.</i> , 388 F. Supp. 2d 319 (S.D.N.Y. 2005)	\$ 6,156,100,670	\$ 336,100,000	5.46%	2.50	✓
3	<i>In re Tyco Int'l Ltd. Multidistrict Litig.</i> , 535 F. Supp. 2d 249 (D.N.H. 2007)	\$ 3,200,000,000	\$ 464,000,000	14.50%	2.70	✓
4	<i>In re Cendant Corp. Sec. Litig.</i> , 109 F. Supp. 2d 285 (D.N.J. 2000)	\$ 3,186,500,000	\$ 262,468,857	8.24%	32.81	✓
5	<i>In re AOL Time Warner Inc. Sec. Litig.</i> , No. 02 Civ. 5575, 2006 WL 3057232 (S.D.N.Y. Oct. 25, 2006)	\$ 2,500,000,000	\$ 147,500,000	5.90%	3.15 ¹¹	✓
6	<i>In re Nortel Networks Corp. Sec. Litig.</i> ("Nortel I"), No. 01 Civ. 01855 (S.D.N.Y. Jan 29, 2007) (Dkt. No. 194)	\$ 1,142,775,308	\$13,160,022.84 and ¹ 9,430,016 shares of stock	3.00%	2.06	✓
7	<i>In re Royal Ahold N.V. Sec. & ERISA Litig.</i> , 461 F. Supp. 2d 383 (D. Md. 2006)	\$ 1,100,000,000	\$ 130,647,869	11.88%	2.57	✓
8	<i>In re Nortel Networks Corp. Sec. Litig.</i> ("Nortel II"), No. 04 Civ. 02115 (S.D.N.Y. Dec. 26, 2006) (Dkt. No. 177)	\$ 1,074,265,298	\$29,612,594.24 and ² 25,146,710 shares of stock	8.00%	4.77	✓
9	<i>In re McKesson HBOC, Inc. Sec. Litig.</i> , No. 99-cv-20743 (N.D. Cal. Jan. 18, 2008) (Dkt. No. 1727)	\$ 960,000,000	\$ 74,784,000 ³	7.79%	2.40	✓
10	<i>In re UnitedHealth Group Inc. PSLRA Litig.</i> , 643 F. Supp. 2d 1094 (D. Minn. 2009)	\$ 925,500,000	\$ 64,785,000	7.00%	3.59 ¹²	✓
11	<i>In re American Int'l Group, Inc. Sec. Litig.</i> , No. 04 Civ. 08141 (S.D.N.Y. Feb. 02, 2012) (Dkt. No. 619)	\$ 822,500,000	\$ 101,912,500	12.39%	0.95	✓
12	<i>In re HealthSouth Corp. Sec. Litig.</i> , No. 03 Civ. 1500 (N.D. Ala.) (Dkt. Nos. 1112, 1617, 1721, 1722)	\$ 804,500,000	\$ 138,199,100 ⁴	17.18%	1.20	✓
13	<i>Carlson v. Xerox Corp.</i> , 596 F. Supp. 2d 400 (D. Conn. 2009)	\$ 750,000,000	\$ 120,000,000	16.00%	1.25	✓

Lodestar/Multiplier and Fee Percentages in PSLRA Settlements \$400 million and Above

The cases highlighted in blue are discussed in the Miller declaration ¶ 58 (\$550 - \$800 million) and in the Coffee declaration ¶ 17 (\$490 - \$690 million)

No.	Order	Total Settlement Amount	Fee Awarded	Fee Percentage Awarded (as percentage of the Gross Settlement Amount)	Lodestar Multiplier	Passed motion to dismiss stage prior to settlement?
14	<i>In re Wachovia Preferred Sec. and Bond/Notes Litig.</i> , No. 09 Civ. 06351 (S.D.N.Y. Jan 03, 2012) (Dkt. No. 161)	\$ 627,000,000	\$ 75,240,000	12.00%	2.30	
15	<i>In re Lucent Techs., Inc. Sec. Litig.</i> , 327 F. Supp. 2d 426 (D.N.J. 2004)	\$ 608,350,000	\$ 102,477,500 ⁵	16.85%	2.14	✓
16	<i>In re Countrywide Fin. Corp. Sec. Litig.</i> , No. 07 Civ. 05295 (C.D. Cal. Mar. 04, 2011) (Dkt. No. 1062)	\$ 601,500,000	\$ 46,472,000	7.73%	0.67	✓
17	<i>In re Cardinal Health Inc. Sec. Litig.</i> , 528 F. Supp. 2d 752 (S.D. Ohio 2007)	\$ 600,000,000	\$ 107,580,000	17.93%	5.85	✓
18	<i>In re Initial Public Offering Sec. Litig.</i> , 671 F. Supp. 2d 467 (S.D.N.Y. 2009)	\$ 586,000,000	\$ 170,084,950	29.02%	0.45	✓
19	<i>In re Lehman Bros. Sec. and ERISA Litig.</i> , No. 09 MD 2017 (S.D.N.Y. June 29, 2012) (Dkt. No. 970)	\$ 516,218,000	\$ 56,729,265	10.99%	1.50	✓
20	<i>In re BankAmerica Corp. Sec. Litig.</i> , 228 F. Supp. 2d 1061 (E.D. Mo. 2002)	\$ 490,000,000	\$ 86,416,085 ⁶	17.64%	3.00	✓
21	<i>In re Merrill Lynch & Co., Inc., Sec., Deriv. and ERISA Litig.</i> , No. 07 Civ. 9633, 2009 WL 2407551 (S.D.N.Y. Aug. 04, 2009)	\$ 475,000,000	\$ 37,121,250	7.82%	2.26	
22	<i>In re Dynegy, Inc. Sec. Litig.</i> , No. H-02-1571 (S.D. Tex. July 7, 2005) (Dkt. No. 686)	\$ 474,050,000	\$35,151,482 and ⁷ \$5,933,476 in stock	8.73%	4.04	✓
23	<i>In re Raytheon Co. Sec. Litig.</i> , No. 99 Civ. 12142 (D. Mass. Dec. 06, 2004) (Dkt. No. 645)	\$ 460,000,000	\$ 41,400,000 ⁸	9.00%	3.15	✓
24	<i>In re Waste Mgm't, Inc. Sec. Litig.</i> , No. H-99-2183 (S.D. Tex. Apr. 29, 2002) (Dkt. No. 248)	\$ 457,000,000	\$ 36,225,000	7.93%	5.29	✓
25	<i>In re Adelphia Commc'ns Corp. Sec. and Deriv. Litig.</i> , No. 03 MDL 1529, 2006 WL 3378705 (S.D.N.Y. Nov. 16, 2006)	\$ 455,000,000	\$ 97,370,000	21.40%	2.89	

Lodestar/Multiplier and Fee Percentages in PSLRA Settlements \$400 million and Above

The cases highlighted in blue are discussed in the Miller declaration ¶ 58 (\$550 - \$800 million) and in the Coffee declaration ¶ 17 (\$490 - \$690 million)

No.	Order	Total Settlement Amount	Fee Awarded	Fee Percentage Awarded (as percentage of the Gross Settlement Amount)	Lodestar Multiplier	Passed motion to dismiss stage prior to settlement?
26	<i>In re Global Crossing Ltd. Sec. and ERISA Litig.</i> , No. 02 Civ. 910 (S.D.N.Y.) (Dkt. Nos. 564, 655, 772); <i>In re Global Crossing Ltd. Sec. and ERISA Litig.</i> , 225 F.R.D. 436 (S.D.N.Y. 2004); <i>In re Global Crossing Ltd. Sec. Litig.</i> , 2005 WL 1668532 (S.D.N.Y. July 12, 2005)	\$ 447,800,000	\$ 72,720,000 ⁹	16.24%	2.57 ¹³	¹⁴
27	<i>In re Qwest Commc'ns Int'l Inc. Sec. Litig.</i> , No. 01 Civ. 01451 (D. Colo. Sept. 29, 2006) (Dkt. No. 1051); 625 F. Supp. 2d 1143 (D. Colo. 2009)	\$ 445,000,000	\$ 66,750,000 ¹⁰	15.00%	3.24	✓
28	<i>Ohio Pub. Emp. Ret. Sys. et al. v. Freddie Mac, et al.</i> , No. 03 Civ. 4261 , 2006 U.S. Dist. LEXIS 98380 (S.D.N.Y. Oct. 26, 2006)	\$ 410,000,000	\$ 82,000,000	20.00%	2.32 ¹³	✓
29	<i>In re Marsh & McLennan Co., Inc. Sec. Litig.</i> , No. 04 Civ. 8144, 2009 WL 5178546 (S.D.N.Y. Dec. 23, 2009)	\$ 400,000,000	\$ 52,911,486	13.23%	0.44	✓

Footnotes:

¹ Nortel I provided for \$438,667,428 and 314,333,875 shares of (pre-consolidation) Nortel stock. 3% of each was awarded to counsel, resulting in \$13,160,022.84 in cash and 9,430,016 shares of common stock.

² Nortel II provided for \$370,157,428 and 314,333,875 shares of Nortel common stock valued at \$2.24/share. 8% of each was awarded to counsel, resulting in \$29,612,594.24 in cash and 25,146,710 shares of common stock.

³ In *McKesson HBOC* , there were separate settlements with different defendants in 2007, 2008 and 2012. Much of the fee data concerning these settlements is not publicly available. The fee data indicated herein is just against the McKesson defendants, which accounts for more than 92% of the total settlement amount.

⁴ There were several different settlements in *HealthSouth* against various defendants over the course of 3 years: \$445 million in 2008, \$109 million in 2009, \$117 million in 2010, and \$133.5 million in 2010 for the Bonds case. Attorneys' fees of \$77,875,000 of \$445 million, or 17.5%, was approved in 2008, \$20,154,100 of \$109 million, or 18.49%, was approved in 2009, \$22,815,000 of \$117 million, or 19.5%, was approved in 2010 and \$17,355,000 of \$133.5 million, or 13%, was approved in 2010 for the Bonds case. The fee percentage and lodestar information here represent the aggregate of all the settlements.

Lodestar Multiplier Averages for...	
3.70	all 29 cases
3.89	the 25 cases that passed motion to dismiss
2.51	the 4 cases that did not pass the motion to dismiss

Lodestar/Multiplier and Fee Percentages in PSLRA Settlements \$400 million and Above

The cases highlighted in blue are discussed in the Miller declaration ¶ 58 (\$550 - \$800 million) and in the Coffee declaration ¶ 17 (\$490 - \$690 million)

No.	Order	Total Settlement Amount	Fee Awarded	Fee Percentage Awarded (as percentage of the Gross Settlement Amount)	Lodestar Multiplier	Passed motion to dismiss stage prior to settlement?
-----	-------	----------------------------	-------------	---	------------------------	--

⁵ There were several different settlements in *Lucent Techs.* for various classes: \$517 million (made up of cash, stock and warrants) for the common shareholders class, \$69 million for the ERISA class, \$4.6 million for an individual plaintiff, \$3.75 million for debt security holders, and \$14 million for the derivative plaintiffs. Attorneys' fees were \$87.89 million (or 17%), \$10.35 million (or 15%), \$920,000 (or 20%), \$937,500 (or 25%) and \$2.38 million (or 17%) for each respective class. The fee percentage and lodestar information here represent the aggregate of all the settlements.

⁶ There were two settlements in *BankAmerica* for different plaintiff classes: \$156.8 million for BankAmerica plaintiffs and \$333.2 million for the NationsBank plaintiffs. Attorneys' fees were \$27.58 million and \$58.83 million respectively. The fee percentage and lodestar information here represent the aggregate of both of the settlements.

⁷ In *Dynegy*, the settlement was \$406.05 million in cash and 17,578,781 shares worth \$68 million of Dynegy stock. The court awarded 8.7257% of both, which amounts to \$35,151,482 in cash and 1,533,872 shares of Dynegy common stock worth \$5.93 million, for a total fee of \$41.08 million.

⁸ There were two settlements in *Raytheon* against multiple defendants: \$210 million in cash and \$200 million worth of settlement warrants with certain defendants, and \$50 million with PricewaterhouseCoopers. The fee percentage and lodestar information here represent the aggregate of both of the settlements.

⁹ There were several different settlements in *Global Crossing* against various defendants: \$245 million with the Global Crossing Officers and Directors ("D&O") on March 19, 2004, \$75 million with Citigroup on March 8, 2005, \$25 million with Arthur Andersen LLP on July 7, 2005, \$99 million with various financial institutions on July 25, 2006 and \$3.8 million with Microsoft Corp. and Softbank Corp. on May 30, 2007. Attorneys' fees were \$38.4 million (approximately 16%), \$13.3 million (or 17%), \$4.5 million (or 17%), \$15.95 million (or 16%) and \$570,000 million (or 15%) from each respective settlement. The fee percentage and lodestar information here represent the aggregate of all the settlements.

¹⁰ There were two settlements in Qwest: \$400 million with certain defendants in 2006 and \$45 million with other defendants in 2009. Attorneys' fees were \$60 million (or 15%) and \$6.75 million (or 15%) respectively. The fee percentage and lodestar information here represent the aggregate of both of the settlements.

¹¹ Counsel submitted \$46.86 million in lodestar, but the Court reduced the lodestar to \$39.97 million and awarded a fee of \$147.5 million. The fee award was 3.15 times the submitted lodestar and 3.69 times the reduced lodestar.

¹² Counsel submitted \$18.06 million in lodestar, but the Court reduced the lodestar to \$9.98 million and awarded a fee of \$64.79 million. The fee award was 3.59 times the submitted lodestar and 6.5 times the reduced lodestar.

¹³ For *Global Crossing* and *Freddie Mac*, the papers setting forth the lodestar multiplier information were not available on PACER or Westlaw. The information set forth in this chart was calculated based on information set forth in Appendix A to the Court's order in *Carlson v. Xerox Corp.* See 596 F. Supp. 2d 400, 414 (D. Conn. 2009).

¹⁴ In *Global Crossing*, the Court ruled on the underwriters' motion to dismiss in December 2003 but had not ruled on the other defendants' motion to dismiss as of the time the first settlement was preliminarily approved in March 19, 2004. In this chart, we treat the case as if it had not passed the motion to dismiss as of the time of settlement.